

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DEBORAH FRAME-WILSON, *et al.*, on behalf
of themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:20-cv-00424-JHC

STIPULATED MOTION AND
ORDER REGARDING PUBLIC
FILING OF PLAINTIFFS' MOTION
FOR AN ORDER REGARDING
PROTECTIVE ORDER
STANDARDS APPLICABLE TO
CLAW BACKS IN PLAINTIFFS'
CASES

ELIZABETH DE COSTER, *et al.*, on behalf of
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:21-cv-00693-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:22-cv-00965-JHC

The Parties have met and conferred with respect to Plaintiffs' Motion for an Order Regarding Protective Order Standards Applicable to Claw Backs in Plaintiffs' Cases, pursuant to the applicable June 3, 2025 Orders Regarding Sealing (*Frame-Wilson* ECF 319; *De Coster* ECF 351; *Brown* ECF 193), and determined that Plaintiffs' and Amazon's briefs, declarations, and exhibits associated with that Motion do not require redactions or sealing. Accordingly, the Parties, pursuant to LCR 7(d)(1) and 10(g), and their respective counsel, hereby stipulate and agree that the docket entries identified in the table below need not remain under seal, and request an order instructing the Docket Clerk to make all of the following docket entries publicly available:

Filing	Date	<i>Frame-Wilson</i> ECF Nos.	<i>De Coster</i> ECF Nos.	<i>Brown</i> ECF Nos.
Plaintiffs' Motion, Beringer Declaration, and Exhibits 1-16	6/3/2025	320; 321 (including exhibits)	352; 353 (including exhibits)	194; 195 (including exhibits)
Amazon's Response Brief, Keeling Declaration, and Exhibits A-B	6/18/2025	328; 329 (including exhibits)	359; 360 (including exhibits)	198; 199 (including exhibits)
Plaintiffs' Reply Brief, Beringer Declaration, and Praecipe	6/24/2025	330; 331; 332	361; 362; 363	200; 201; 202

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

DATED July 7, 2025.

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Steve W. Berman

Steve W. Berman (WSBA No. 12536)

By: /s/ Barbara A. Mahoney

Barbara A. Mahoney (WSBA No. 31845)

1301 Second Avenue, Suite 2000

Seattle, WA 98101

Telephone: (206) 623-7292

Facsimile: (206) 623-0594

E-mail: steve@hbsslaw.com

barbaram@hbsslaw.com

Anne F. Johnson (*pro hac vice*)

594 Dean Street, Suite 24

Brooklyn, NY 11238

Telephone: (718) 916-3520

E-mail: annej@hbsslaw.com

KELLER POSTMAN LLC

Zina G. Bash (*pro hac vice*)

111 Congress Avenue, Suite 500

Austin, TX, 78701

Telephone: (512) 690-0990

E-mail: zina.bash@kellerpostman.com

Jessica Beringer (*pro hac vice*)

Alex Dravillas (*pro hac vice*)

Shane Kelly (*pro hac vice*)

150 North Riverside Plaza, Suite 4100

Chicago, Illinois 60606

Telephone: (312) 741-5220

E-mail: Jessica.Beringer@kellerpostman.com

E-mail: ajd@kellerpostman.com

E-mail: shane.kelly@kellerpostman.com

*Interim Co-Lead Counsel for Plaintiffs and the
proposed Class*

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Alicia Cobb

Alicia Cobb, WSBA # 48685
1109 First Avenue, Suite 210
Seattle, WA 98101
Telephone: (206) 905-7000
Email: aliciacobb@quinnemanuel.com

Steig D. Olson (*pro hac vice*)
David D. LeRay (*pro hac vice*)
Nic V. Siebert (*pro hac vice*)
Maxwell P. Deabler-Meadows (*pro hac vice*)
Elle Mahdavi (*pro hac vice*)
295 Fifth Ave.
New York, NY 10016
Telephone: (212) 849-7000
Email: steigolson@quinnemanuel.com
Email: davidleray@quinnemanuel.com
Email: nicolassiebert@quinnemanuel.com
Email: maxmeadows@quinnemanuel.com
Email: ellemahdavi@quinnemanuel.com

Adam B. Wolfson (*pro hac vice*)
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017-2543
Telephone: (213) 443-3000
Email: adamwolfson@quinnemanuel.com

*Interim Executive Committee for Plaintiffs and the
proposed Class*

DAVIS WRIGHT TREMAINE LLP

By /s/ John A. Goldmark

John A. Goldmark, WSBA # 40980
MaryAnn Almeida, WSBA #49086
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
Telephone: (206) 622-3150
Email: johngoldmark@dwt.com
Email: maryannalmeida@dwt.com

DUNN ISAACSON RHEE LLP

Karen L. Dunn (*pro hac vice*)
William A. Isaacson (*pro hac vice*)
Amy J. Mauser (*pro hac vice*)
Kyle Smith (*pro hac vice*)
401 Ninth Street, NW
Washington, DC 20004-2637
Telephone: (202) 240-2900
E-mail: kdunn@dirllp.com
E-mail: wisaacson@dirllp.com
E-mail: amauser@dirllp.com
E-mail: ksmith@dirllp.com

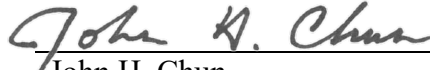
Meredith Dearborn (*pro hac vice*)
345 California Street
Suite 600
San Francisco, CA 94104-2671
Telephone: (202) 240-2900
E-mail: mdearborn@dirllp.com

Attorneys for Amazon.com, Inc.

1 IT IS SO ORDERED. The Docket Clerk is directed to make the docket entries identified in the
2 table above publicly available.

3 July 8, 2025

4 Dated



John H. Chun

United States District Judge